

1 KEKER, VAN NEST & PETERS LLP  
BENEDICT Y. HUR - # 224018  
2 bhur@keker.com  
JULIA L. ALLEN - # 286097  
3 jallen@keker.com  
SHAYNE HENRY - # 300188  
4 shenry@keker.com  
SARAH SALOMON - # 308770  
5 ssalomon@keker.com  
6 633 Battery Street  
San Francisco, CA 94111-1809  
Telephone: 415 391 5400  
7 Facsimile: 415 397 7188

8 Attorneys for Non-Party SUPERLUCKY CASINO, INC.

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 OAKLAND DIVISION

12 DAN VIGDOR, an individual; STEPHEN  
BRADWAY, an individual,

13 Plaintiffs,

14 v.

15 ANDREW KARAM, an individual; FASSIL  
16 BEFEKADU, an individual; ROCKET  
STREET VENTURES LLC, a California  
17 limited liability company; RKSGB GMBH, an  
unknown entity; ANTHONY SOOHOO  
18 AND MERRILEE SOOHOO  
REVOCABLE TRUST, an unknown entity;  
19 THREE KINGDOMS CAPITAL  
PARTNERS, L.P., a Delaware limited  
20 partnership; JOHN AND ISABELE  
KRYSTYNAK 2011 FAMILY TRUST, an  
21 unknown entity; ANKUR NAGPAL, an  
individual; WARREN KONKEL, an  
22 individual; ADAM AND JACLYN  
FOROUGH 2011 FAMILY TRUST, an  
23 unknown entity; VANDANA SHAH AND  
PRAFUL SHAH REVOCABLE LIVING  
24 TRUST, an unknown entity; RAJAN  
DALICHAND SHAH, an individual; THE  
25 ETERNAL BLISS LIMITED  
PARTNERSHIP, a California limited  
26 partnership; MITUL MAHESH SHAH, an  
individual; MLPF&S AS CUST FBO  
27 MICHAEL LEVINTHAL IRRA, an  
unknown entity; KARL JACOB, an  
28 individual; 500 STARTUPS, L.P., a  
Delaware limited partnership; ROSE

Case No. 4:18-cv-04573-HSG

**DECLARATION OF SARAH SALOMON  
PURSUANT TO CIV. L.R. 79-5(E)(1) ISO  
SEALING NON-PARTY SUPER LUCKY  
CASINO, INC.'S CONFIDENTIAL  
INFORMATION**

Dept.: Courtroom 2 - 4th Floor  
Judge: Hon. Haywood S. Gilliam, Jr.

Date Filed: July 31, 2018

Trial Date:

PARTNERS LLC, an unknown entity;  
STEPHEN TALARICO, an individual; and  
DOES 1-50, inclusive,

Defendants.

I, SARAH SALOMON, declare as follows:

1. I am an attorney, duly licensed to practice law in California, at the law firm of Keker, Van Nest & Peters LLP, attorneys for non-party Super Lucky Casino, Inc. (“Super Lucky”). I have personal knowledge of the matters set forth herein and, if called upon as a witness, could and would competently testify thereto.

2. Pursuant to Civ. L.R. 79-5(e)(1), I submit this declaration in support of sealing non-party Super Lucky’s confidential documents attached as exhibits to Plaintiffs’ Opposition to Defendants’ Motion to Dismiss, and the redaction of references to confidential Super Lucky materials in Plaintiffs’ Opposition. I have knowledge of the facts set forth herein, and if called upon as a witness, I could testify to them competently under oath.

3. The categories of documents and information to be sealed is as follows:

Redaction / Sealed Document	Basis for Sealing
<b>Pls’ Opp’n. Exs. A-D</b>	Super Lucky’s sensitive communications with and regarding then-Super Lucky noteholders, now shareholders.
<b>Pls’ Opp’n at 3:17-18; 3:21-27; 4:1-2; 4:19-22; 4:24; 5:1-2; 5:4-10</b>	Citations to Super Lucky’s sensitive communications with and regarding then-Super Lucky noteholders, now shareholders.

4. On September 21, 2018, Plaintiffs filed their Opposition to Defendants’ Motion to Dismiss. *Vigdor et. al. v. Karam et. al.*, Case No. 4:18-cv-04573-HSG (“Second Action”), Dkt. No. 31. That Opposition and its exhibits (which were attached directly to the Opposition) contain redactions and conditionally sealed exhibits pursuant to the parties’ Stipulated Protective Order in *Vigdor et. al. v. Super Lucky et. al.* (“First Action”), 4:16-cv-05326-HSG (Dkt. No. 73).

5. The redacted and conditionally sealed materials consist communications with and regarding then-Super Lucky noteholders, now shareholders. Attached hereto as Exhibit A is a true and correct copy of a declaration from Nicholas Talarico. This Declaration provides the factual bases for the sealing and redaction of this confidential Super Lucky information. Additionally, the Court has already sealed this type of information (sensitive communications

1 with and regarding noteholders) in *Vigdor et. al. v. Super Lucky et. al.* (“First Action”), 4:16-cv-  
2 05326-HSG (Dkt. No. 143).

3 6. Super Lucky expresses no opinion as to whether page 3, line 13 should be sealed,  
4 as it currently has been by Plaintiffs. That line reflects Plaintiffs’ opinion regarding the current  
5 value of Super Lucky, as indicated in Plaintiffs’ First Amended Complaint, Second Action, Dkt.  
6 6, at ¶ 56 (“Plaintiffs are informed and believe that Super Lucky is now valued in excess of \$100  
7 million.”).

8 I declare under penalty of perjury under the laws of the United States of America that the  
9 foregoing is true and correct and that this declaration was executed on September 25, 2018 at San  
10 Francisco, California.

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13 SARAH SALOMON  
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